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AO 91 (Rev. 11/11) Criminal Complaint

Task Force Officer: Chad Taylor (FBI)

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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Moses CHAMPION

Case:2:20-mj-30044
 Judge: Unassigned,
 Filed: 01-29-2020 At 01:12 PM
 CMP USA V CHAMPION (af)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 11/6/18 & 12/28/18; 12/15, 21, 24, 27/19 in the county of Oakland in the Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

Title 18 U.S.C. § 1951(a)

Hobbs Act Robbery

Title 18 U.S.C. § 924(c)(1)(A)

Use or carry a dangerous weapon in a crime of violence

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: JAN 29 2020

City and state: Detroit, Michigan



Complainant's signature

Task Force Officer Chad Taylor, FBI

Printed name and title



Judge's signature

Hon. David R. Grand, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

The affiant being duly sworn deposes and states the following:

1. Your affiant is a sworn police officer with the Auburn Hills Police Department in the County of Oakland, State of Michigan, currently assigned to the FBI Oakland County Gang and Violent Crime Task Force (OCGVCTF), and has been employed as a police officer since December 2014.

2. Your affiant has personal knowledge of the facts set forth herein or has been provided information by other law enforcements officers having personal knowledge of the facts set forth herein. Since this affidavit is being submitted for the limited purpose of obtaining a criminal complaint, your affiant has not included each and every fact known to him concerning this investigation, rather your affiant has set forth only the facts necessary to establish probable cause.

3. On November 6, 2018, the Dearborn Heights Police Department was dispatched to a hold up alarm at Taco Bell located at 8112 N. Telegraph Road, Dearborn Heights, Michigan. The alarm company observed a subject on video with a handgun and was described as a younger black male wearing a black hooded sweatshirt and black pants, gloves, and a scarf around his mouth. The suspect entered the store and pointed a handgun at the employee and demanded money and stated "bitch gimme the money, bitch gimme the money." The employee complied and handed the suspect the cash register drawer full of money.

Employees advised they observed a second suspect holding the door who was described as a younger black male, wearing dark gray sweat pants and hooded sweatshirt with the hood up and a mask covering his face. The suspects then fled the business and were last seen running across the parking lot.

4. The Dearborn Heights Police department conducted a K9 track leading to the recovery of multiple items of evidence to include various denominations of U.S. currency, a black glove worn by one of the suspects, a black and gray sweatshirt, black ski mask, and a black with gray winter hat. The Dearborn Heights Police Department sent the items to the Michigan State Police Forensic Laboratory, which developed DNA from the ski mask leading to a CODIS hit identifying MOSES CHAMPION, date of birth XX-XX-2000, as the contributor of the DNA.

5. On December 28, 2018, the Redford Police Department responded to an armed robbery at the Starbucks located at 9052 Telegraph Road, Redford, Michigan. After arriving on scene, the Redford Police Department learned that two black males wearing ski masks entered the store and each displayed a handgun while demanding money from the register and safe. The suspects shouted commands: “put the money in the bag” and “hurry the fuck up or I’ll shoot you.” One of the suspects then produced a bag for the money while the other suspect

pulled the cash register drawers out. The suspects took the money from the cash drawers and then fled with approximately \$1,600 in U.S. currency.

6. On December 15, 2019, the Livonia Police Department was dispatched to a robbery at Taco Bell located at 11707 Merriman Road, Livonia, Michigan. Officers learned that an employee had observed the suspect walking behind the counter. The suspect was described as a black male, wearing a black ski mask, gray bubble coat, with a backpack. The suspect implied he had a gun by keeping his hand on his right hip. The suspect ordered the employee to open the safe and stated “don’t make me shoot you.” The employee immediately opened the safe and the suspect began grabbing rolled change and bills from the safe. The suspect then fled with approximately \$1,983 in U.S. currency.

7. On December 21, 2019, the Oakland County Sheriff’s Office was dispatched to an armed robbery at Taco Bell located at 6946 Sashabaw Road, Independence Township, Michigan. Deputies learned that two black males wearing masks entered the store and each displayed a handgun. The subjects demanded cash from the safe and drawers, with which an employee complied. Another employee was put up against the wall by the suspects and ordered not to move. A third employee was grabbed by one of the subjects and pushed to the front of the store. After receiving approximately \$1,800, the subjects fled the location.

8. On December 24, 2019, the Milford Police Department was dispatched to a robbery at Taco Bell located 525 General Motors Road, Milford, Michigan. Officers learned that two black males wearing hoods and ski masks entered the store. One of the suspects said “bitch open the safe” to one of the employees. Employees stated the suspects implied they had a firearm. One of the suspects told an employee to give the first suspect the money or he would kill her. The suspects fled the location after receiving approximately \$200.

9. December 27, 2019, the Auburn Hills Police Department responded to a robbery at Burger King located at 910 N. Opdyke Road, Auburn Hills, Michigan. Officers learned that two black males wearing masks entered the store and implied with their actions that they were armed. One of the suspects entered the store and stated to an employee “come here.” A second employee then ran out of the back of the store activating the alarm. The suspects fled the location without receiving any money.

10. On January 28, 2020, the FBI OCGVCTF executed a search warrant at the residence of MOSES CHAMPION. CHAMPION was located inside of the residence and was detained. During the search of the location, several items of clothing were recovered that matched clothing used in some of the robberies. CHAMPION was interviewed, and, after waiving his *Miranda* rights, admitted to his involvement in the above listed five robberies and one attempted robbery.

CHAMPION admitted that the gun he used in the robberies was now in a lake.

CHAMPION stated it was a black .40 caliber handgun and he discarded it after the attempted robbery at the Burger King in Auburn Hills, Michigan.

11. It is believed that the aforementioned businesses are involved in interstate commerce.

12. Your affiant believes that probable cause exists that on or about November 6, 2018, MOSES CHAMPION did commit the robbery which affected interstate commerce in violation of Title 18, United States Code, Section 1951(a).

13. That your affiant believes that probable cause exists that on or about November 6, 2018, MOSES CHAMPION, did possess a firearm in furtherance of a crime of violence for which he could be prosecuted in a court of the United States in violation of Title 18, United States Code, Section 924(c)(1)(A).

14. Your affiant believes that probable cause exists that on or about December 28, 2018, MOSES CHAMPION did commit the robbery which affected interstate commerce in violation of Title 18, United States Code, Section 1951(a).

15. That your affiant believes that probable cause exists that on or about December 28, 2018, MOSES CHAMPION, did possess a firearm in furtherance of a crime of violence for which he could be prosecuted in a court of the United States in violation of Title 18, United States Code, Section 924(c)(1)(A).

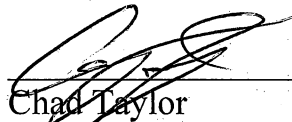
16. Your affiant believes that probable cause exists that on or about December 15, 2019, MOSES CHAMPION did commit the robbery which affected interstate commerce in violation of Title 18, United States Code, Section 1951(a).

17. Your affiant believes that probable cause exists that on or about December 21, 2019, MOSES CHAMPION did commit the robbery which affected interstate commerce in violation of Title 18, United States Code, Section 1951(a).

18. That your affiant believes that probable cause exists that on or about December 21, 2019, MOSES CHAMPION, did possess a firearm in furtherance of a crime of violence for which he could be prosecuted in a court of the United States in violation of Title 18, United States Code, Section 924(c)(1)(A).

19. Your affiant believes that probable cause exists that on or about December 24, 2019, MOSES CHAMPION did commit the robbery which affected interstate commerce in violation of Title 18, United States Code, Section 1951(a).

20. Your affiant believes that probable cause exists that on or about December 27, 2019, MOSES CHAMPION attempted to commit a robbery which affected interstate commerce in violation of Title 18, United States Code, Section 1951(a).



Chad Taylor
Task Force Officer
Federal Bureau of Investigation

Sworn to before me and signed in my
Presence and/or by reliable electronic means.

A handwritten signature in black ink, appearing to read "David R. Grand", written over a horizontal line.

Honorable David R. Grand
United States Magistrate Judge

1/29/2020